

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA

RECEIVED

DOROTHY A. LANGFORD )  
Plaintiff, )  
v. )  
MCDONALD'S CORPORATION )  
Defendant, )

2007 APR 11 A 11:31  
CASE NO. 2:06-cv-01025-WKW

DEBRA P. HACKETT, CLERK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

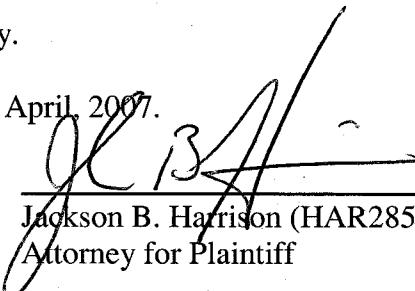
**MOTION TO AMEND COMPLAINT TO ADD A PARTY**

COMES NOW Plaintiff, by and through undersigned counsel, and moves this Honorable Court to grant Plaintiff's Motion to Amend the above styled Complaint to add a party. In support of Motion Plaintiff states as follows:

- 1) The proposed additional Defendant, DBR, INC, is the entity that holds the local franchise and is an indispensable party to this claim.
- 2) Pursuant to Rule 19 of the Federal Rules of Civil Procedure, the proposed additional Defendant, DBR, INC "shall be joined as a party in the action if ... in the person's absence complete relief cannot be accorded among those already parties."
- 3) The identity of the proposed additional Defendant, DBR, INC. has only recently become ascertainable.

WHEREFORE, the Plaintiff having a lawful claim against the proposed Defendant, DBR, INC, the Plaintiff respectfully prays that this Honorable Court grant its Motion to Amend Complaint to Add a Party.

Respectfully submitted this the 10th day of April, 2007.

  
\_\_\_\_\_  
Jackson B. Harrison (HAR285)  
Attorney for Plaintiff

OF COUNSEL:

The Harrison Firm, LLC  
8425 Crossland Loop  
Montgomery, AL 36117  
(334) 819-8920  
(334) 819-8923 fax

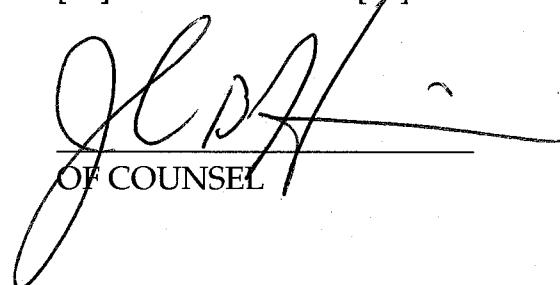
**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the above and foregoing upon the following persons by means of delivery shown below and to the location designated, properly addressed and delivery charges prepaid on this the 2ND day of MARCH, 2007, viz:

JACK L. MCLEAN, JR., ESQ  
ONE ATLANTIC CENTER SUITE, 2000  
1201 WEST PEACHTREE STREET, NE  
ATLANTA, GA 30309

Sally B. Waudby, ESQ  
Lehr Middlebrooks & Vreeland, P.C.  
P.O. Box 11945  
Birmingham, AL 35202-1945

U.S. MAIL  HAND DELIVERY  FACSIMILE  FEDEX

  
\_\_\_\_\_  
OF COUNSEL